

EXHIBIT L



Subject: James v. Experian
From: Matt Erausquin
To: Joseph W Clark, Edward M Wenger
Cc: Leonard Bennett, Casey Nash , Janelle Mason

05/29/2013 10:15 AM

History: This message has been forwarded.

Joe: I just tried calling your office and they said you weren't in yet. I have to catch a flight this afternoon, so here's our position on the remaining issues we discussed last week on the protective order:

- 1) We will agree to disclose all individuals that have executed Exhibit A (including consulting experts), provided that Experian will agree to a reciprocal provision for all individuals (inside or outside of Experian) that review materials designated as Confidential in conjunction with this case. (paragraph 5)
- 2) We are also okay with your change to "shall file" instead of "attempt to file". (new paragraph 8)
- 3) We will agree to "two business days" to meet and confer prior to filing designated materials. (new paragraph 8)
- 3) We do not agree to destroy our attorney work product at the end of the case. We do agree to otherwise continue to be bound by the protective order thereafter, and will therefore not disclose information designated as Confidential to third parties. (new paragraph 9).
- 4) We do not agree to extend the clawback provisions of FRE 502 to material that you should have designated as Confidential. The language as it now exists provides you with the opportunity to file any motion you want in the event that you inadvertently produce something that you later believe should have been designated as Confidential. (new paragraph 10).

Other issues:

- A) We would like your consent to extend our time to amend the complaint through the end of July.
- B) We previously noticed the deposition of Experian's management employee primarily responsible for overseeing the process by which consumer disputes are processed. We moved it at your request. Please provide us with new dates in the next two weeks. (We will likely take this telephonically).
- C) If Experian is content to wait until August to mediate, please send your preferred dates and we will confirm on our end.

Thanks,
Matt

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